

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

DEFENSE DISTRIBUTED,

Plaintiff,

v.

YOUTUBE LLC, GOOGLE LLC, and  
ALPHABET, INC.

Defendants.

No.1:25-cv-01095-ADA-ML

**JOINT STATEMENT REGARDING VENUE DISCOVERY**

TO THE HONORABLE MARK LANE:

Plaintiff Defense Distributed (“Plaintiff”) and Defendants YouTube LLC, Google LLC, and Alphabet, Inc. (“Defendants”) (Plaintiff and Defendants together, the “Parties”) file this joint statement in response to the Court’s order (ECF No. 36) setting a status conference for September 17, 2025 for the purpose of discussing whether venue discovery is needed to fully address Defendants’ pending motion to transfer venue (“Motion”). In its order, the Court ordered the Parties to meet and confer and submit to the Court, by September 15, 2025, either a joint proposal of discovery limitations or a joint statement that no discovery is needed.

Pursuant to the Court’s order, the Parties have met and conferred and agree that no venue discovery is necessary to fully address the Motion. Accordingly, the Parties respectfully request that the Court cancel the September 17, 2025 status conference.

Dated: September 10, 2025

Respectfully submitted,

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### **CERTIFICATE OF CONFERENCE**

The undersigned certifies that Defendants' counsel conferred with Plaintiff's counsel prior to filing the foregoing Joint Statement Re Venue Discovery. Counsel for all Parties agreed to jointly seek the requested relief.

/s/Steve Wingard

Steve Wingard

### **CERTIFICATE OF SERVICE**

Pursuant to the Federal Rules of Civil Procedure and Local Rule CV-5, I hereby certify that, on September 10, 2025, all counsel of record who have appeared in this case are being served with a copy of the foregoing via the Court's CM/ECF system.

/s/Steve Wingard

Steve Wingard